

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KEITH STANSELL, et al.

CASE NO.: 1:16-mc-00405-ALC

Judge Andrew L. Carter, Jr.

Plaintiffs,

vs.

REVOLUTIONARY ARMED FORCES  
OF COLOMBIA (FARC); et al.,

Defendants.

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**PLAINTIFFS' EX PARTE, EXPEDITED MOTION FOR ISSUANCE OF  
POST-JUDGMENT TRIA WRIT OF EXECUTION**

Plaintiffs move for expedited issuance<sup>1</sup> of an Order supplementing this Court's December 15, 2020 Sealed Order [DE 114] and January 7, 2021 Sealed Order [DE 130] that directed issuance of writs of execution against blocked assets owned by several Venezuelan "Cartel of the Suns" members.

Plaintiffs now respectfully move for a supplemental Order directing issuance of a writ of execution for blocked assets of the Venezuelan Ministry of Finance a/k/a Ministerio del Poder Popular de Economía y Finanzas, which are held by Citibank, N.A. Plaintiffs' evidence and expert witness testimony filed previously specifically established that the Venezuelan Ministry of Finance is a member of the Cartel of the Suns and an agency or instrumentality of the FARC. *See Farah Affidavit DE 111-3, p. 37, ¶63; Gaddis Affidavit DE 111-4, p. 21, ¶ 35.*

WHEREFORE Plaintiffs respectfully request entry of an Order in the proposed form attached as Ex. 1, directing the Clerk to issue the writ of execution in the proposed form attached as Ex. 2 to blocked assets of the Venezuelan Ministry of Finance held by Citibank, N.A.

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<sup>1</sup> Plaintiffs respectfully request expedited review and relief by *Friday Feb. 5, 2021* so that they may promptly attach these assets and perfect their judgment liens under New York law.

Respectfully submitted February 2, 2021

/s/ Newton P. Porter

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 2, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that I served the foregoing document and the notice of electronic filing by first class mail and electronic mail to the following persons:

OFFICE OF FOREIGN ASSETS CONTROL

U.S. Department of the Treasury

1500 Pennsylvania Ave. NW

Washington DC

*Via email to OFAC counsel in compliance with 31 CFR 501.605*

None of the FARC defendants have appeared and defaults were properly entered against them all prior to entry of the Default Judgment. Accordingly, no further notice, service of pleadings, motions or writs is required to be served on the FARC or the individual FARC members identified in the ATA Judgment. Fed. R. Civ. P. 5(a)(2).

/s/ Tony Korvick

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